

September 19, 1992

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COMMENTS ON PR DOCKET NO. 92-136 (REVISION OF FCC SECTION 97.113)

I agree with the need to modify Section 97.113 to properly support amateur radio public service activity. I am a member of a ham radio group that supports Boston's annual Walk for Hunger, and our efforts to support this worthy cause have been seriously hampered by the ambiguity of the present rules. However, the exact wording proposed in PR Docket 92-136 may not accomplish the desired goal.

The present 97-113 includes ambiguous terms, such as "primary beneficiary", which have lead to heated debates among hams. For example, who benefits more from communications about picking up tired walkers in the Walk for Hunger - the walkers, or the bus company? Paragraph (4) of the proposed revision contains such ambiguous language, prohibiting "communications, on a regular basis, which could be reasonably furnished alternatively through other radio services". The ambiguous terms are "regular" and "reasonably". The Walk for Hunger is held on a regular basis, once per year, and could be supported with alternative services, such as rented commercial two-way radio equipment.

The present 97-113, although needing improvements, does mention "parade, race, marathon or similar public gathering". The proposed replacement does not mention public service activity at all. This seems like a step backwards.

One of the problems with the present 97-113 is the lack of distinction between charitable organizations and commercial businesses. I believe that the new rules should make a distinction between these two categories. For example, I think that all communications in support of the Walk for Hunger should be allowed. The Walk's purpose is to feed hungry people in Massachusetts. I can't think of a better use of amateur radio. Support for events run by for-profit businesses, such as a professional golf association, should be restricted to public safety, per the present rules.

Please review the following list of communications activity that we would like to do at the Walk for Hunger, and make sure that the new 97-113 unambiguously allows and encourages such activity:

- o Arrange for movement of bandages, water, ice, oranges, and walker registration papers
- o Give instructions to volunteers to purchase such supplies, and answer questions about reimbursement for these purchases
- o Arrange for volunteers for first aid, water tables, and to check off walker forms at checkpoints

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- o Send messages about marshall movement and release (marshalls keep the walkers safely on the proper route through the city)
- o Report on walk progress
- o Relay instructions to marshalls for the purpose of keeping the walkers on the correct route
- o Pass emergency traffic requiring relay to police or ambulance
- o Resolve problems with streets that were supposed to be closed to vehicular traffic, but aren't
- o Send requests for additional police officers
- o Pass lost children messages
- o Pass messages about the distribution of traffic cones
- o Resolve problems with traffic cones, e.g. they weren't placed correctly as planned
- o Relay the number and location of walkers awaiting bus transportation
- o Advise bus officials where their busses are needed
- o Pass messages about hiring extra buses, including, when necessary, unplanned negotiating about payment to a bus company
- o Send instructions to close checkpoints
- o Relay messages about the Walk sent for the interest of the hams and the participants, e.g. "There are 57,000 walkers, and they are expected to raise \$3,500,000 for the hungry in Massachusetts"
- o Relay messages about a musical performance, e.g. "go tell the band that it's time for them to perform", or "tell them to turn it down".
- o Registration traffic, e.g. "need pens/papers", "shutting down"
- o Boston Police Liaison
- o Communicate with Walk staff (problem solving)
- o Relay messages about trash pickup, including authorization for unplanned payment of extra hired workers.
- o Communicate with the Food Vendor Coordinator, to ensure that all food vendors are located properly, and are not charging the walkers above pre-arranged price limits.

Thank you and 73,

Eliot Mayer

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